

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN DIVISION**

HIRSCHBACH MOTOR LINES, INC.,

Plaintiff,

vs.

NAVISTAR, INC. & NAVISTAR
INTERNATIONAL CORPORATION,

Defendants.

Case No. 20-1031

**PROPOSED SCHEDULING ORDER
AND
DISCOVERY PLAN**

Counsel have conferred and submit the following case information and proposed dates for case management:

1. Did the parties both (a) enter into an agreement during the Rule 26(f) conference resolving all issues relating to initial disclosures, and (b) discuss the preservation, disclosure, and discovery of electronically stored information? **Yes.**

If the parties have agreed to a deadline for making the initial disclosures, state the date by which the initial disclosures will be made: **January 22, 2021.**

If any party objected during the Rule 26(f) conference to making or to the timing of the initial disclosures, then the objecting party must, within 14 days after this schedule and plan has been submitted, serve and file a document in which the objections are set forth with particularity.

2. Deadline for motions to add parties: **January 24, 2022.**
3. Deadline for motions to amend pleadings: **January 24, 2022.**
4. Expert witnesses disclosed by:
 - a) Plaintiff: **December 10, 2021.**
 - b) Defendant: **February 11, 2022.**
 - c) Plaintiff Rebuttal: **March 14, 2022.**
5. Deadline for **completion** of discovery: **April 25, 2022.**

6. Dispositive motions deadline (*at least 150 days before Trial Ready Date*):

May 25, 2022.

7. Trial Ready Date (*at least 150 days after Dispositive Motions Date*):

October 24, 2022.

8. Has a jury demand been filed? **Yes.**

9. Estimated length of trial: **10 days.**

10. Do the parties unanimously consent to trial, disposition and judgment by a U.S. Magistrate Judge, with appeal to the Eighth Circuit Court of Appeals pursuant to 28 U.S.C. § 636(c)(3)? **No.**

11. Are each of the attorneys in this case admitted to practice in the Northern District of Iowa pursuant to Local Rule 83? **Yes.**

Dated November 19, 2020.

**HIRSCHBACH MOTOR LINES, INC.,
Plaintiff,**

BY: /s/ Jeana L. Goosmann

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